GOLDBERG & FLIEGEL LLP
ATTORNEYS AT LAW
60 EAST 42ND STREET, SUITE 3421
NEW YORK, NEW YORK 10165
www.goldbergfliegel.com

KENNETH A. GOLDBERG
MICHELE L. FLIEGEL

TELEPHONE: (212) 983-1077
FACSIMILE: (212) 973-9577

January 26, 2011

BY ECF

Hon. Andrew L. Carter, Jr.
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N505
Brooklyn, New York 11201

Re: Koumoulis et al. v. Independent Financial Marketing Group, Inc. et al. 10-cv-0887 (KAM) (ALC)

Dear Judge Carter:

We represent the Plaintiffs in the above matter. This letter is the parties' joint status report. The parties are engaged in written and document discovery. On January 25, 2011, my firm provided Defendants with an initial set of proposed search terms for electronic discovery and we expect such electronic discovery to take place during February 2011. The parties then expect to conduct depositions. I also note that my firm has federal court trials scheduled for January 31, 2011 and March 7, 2011 and those matters have required extensive pre-trial preparation. At this juncture, it is anticipated that parties may need an extension of time to complete fact discovery, including depositions. If necessary, the parties intend to write to the Court prior to March 4, 2011 to propose a revised schedule for completion of discovery.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

Kenneth A. Goldberg